Milford Power Limited Partnership
Supplement to Sewer Connection Permit Application
BWP IW 39 - Transmittal Number W901320
Permit No. W026546

Section B, Item 5: Are you in compliance with the Massachusetts Environmental Policy Act (MEPA) requirements?

The original Milford Power project, which consisted of the building and operation of a natural gas-fired generating facility, required filing under 301 CMR 11.00 under MEPA. The requirements of these regulations were met prior to the submittal of the original permit application. The Environmental Notification Form was published in the Monitor on June 11, 1990. The Draft Environmental Impact Report (EIR) was submitted in January of 1991 and the Final EIR was submitted in May, 1991. The EOEA number for this project is 8270. The Final EIR MEPA Certificate was issued on June 10, 1991 and a copy was included in the original permit application (Transmittal No. 24632). The renewal of the Sewer Connection Permit is not subject to review under 301 CMR 11.00.

Section B, Item 6: Check all pollutants that are present in your industrial wastewater before pretreatment, of if not treated, before discharge.

The discharge is a combination of sanitary sewage and blowdown from the boilers, cooling towers and demineralizer systems. The influent to the Milford Power system is a combination of potable water obtained from the Milford Water Company and effluent from the Milford Wastewater Treatment Facility (MWWTF). MWWTF effluent is concentrated by the action of the cooling towers.

Industrial effluent monitoring and sampling have been conducted within the facility at a location specified by MWWTF staff. The results of this monitoring are summarized in the attached Table 1, which includes the results of the continuous monitoring (flow, pH, temperature and conductivity).

Section B, Item 6b: If Toxic Pollutants are present, provide the total Toxic Pollutants concentration in ug/l.

For Informational purposes: During the facility permit renewal in 2002, the semi-annual monitoring requirements for VOCs, SVOCs, and PCB/Pesticides were removed from the permit as analytical results for the 5-year permit period indicated that concentrations for these parameters were below or slightly higher than the detection limits. Only concentrations of three VOCs were detected in the 8 semi-annual samples collected from 1998 to 2002. These included chloroform (average of 3.18 ug/l at an RDL of 1.5 ug/l), bromodichloromethane (average of 0.69 ug/l at an RDL of 1.0 ug/l) and acetone (average of 7.5 ug/l at an RDL of 10 ug/l). The analytical results from the semi-annual monitoring for SVOCs, and PCB/Pesticides indicated concentrations below the detection limits.

Section C, Item 15: Is this your first permit application under Permit Category BWP IW 38 or BWP IW 39 for this IWPS? Or, is this application a request for modification of this IWPS that currently has a BWP IW 38 or BWP IW 39 permit? (Re: IWPS principal treatment processes description.)

Raw water is demineralized by use of cation, ion, and mixed bed vessels within the demineralization building. Several floor drains are also in the demineralization building.

When the demineralizing beds are exhausted, the demineralization beds are regenerated with caustic and acid. Regeneration wastewater effluent is routed to the neutralization aboveground storage tank. The demineralization building floor drains are also routed to neutralization aboveground storage tank.

Prior to discharge, acid is added into the neutralization tank by two neutralization injection pumps. Two neutralization circulating pumps re-circulate the stored effluent in the neutralization tank to aide in mixing of the water with the injected acid.

The neutralization process is manually initiated from the control room by the certified wastewater control room operator. This automated process injects acid for a period of two minutes then allowed to stabilize for five minutes while the wastewater is continuously re-circulated. This automated process will continue until wastewater effluent pH reading stabilizes between 6.5 and 9.5 within the neutralization tank. Once the wastewater is stabilized and pH is in range, the neutralizing re-circulating process automatically stops. When the neutralization process is completed, the tank is pumped down and discharged to the POTW.

Enclosed is the neutralization process P&ID for your review.

Section C, Items 17a and 18: Name and Address of Massachusetts Registered Professional Engineer Designing the Proposed System:

Mr. Michael F. Delleo, Jr., chemical PE number 33806, approved and stamped the original drawing dated 10-11-1991. Because the original submittal date was 1991, Milford Power no longer is in contact w/ Mr. Delleo and subsequently do not know any contact information.

No design work has been performed on the system since the submittal of the original permit application (Transmittal No. 24632) dated 1991. The MA Registered Professional Engineer information responsible for the original system is available in that Transmittal. No MA Registered Professional Engineer is provided in this application as none was employed.

Similarly, because no design work has been performed, engineering reports and plans were not produced for this application.

Because the manufacturing processes, water balance, wastewater contributing process lines and pollution prevention techniques have not changed since the original application was submitted, a description of these items is not repeated here.